

## **AFFIDAVIT**

I, Adam Chetwynd, being duly sworn, depose and state as follows:

### **INTRODUCTION**

1. I am a Special Agent with the United States Department of Justice Drug Enforcement Administration (DEA) and have been since April 2004. I am currently assigned to the DEA's Burlington, Vermont Resident Office (RO). In connection with my duties and responsibilities as a law enforcement officer, I have received extensive training in narcotics investigations and enforcement to include both formal and informal training in the investigation of violations of controlled substance offenses. I have received approximately 16 weeks of Basic Training at the DEA Academy in Quantico, Virginia. The DEA Academy provided training in conducting narcotics investigations to include: identification, interdiction, smuggling, clandestine manufacturing, methods of packaging, and distribution of drugs; undercover operations; the laundering of drug proceeds; asset forfeiture; use of confidential sources; and the legal aspects of conducting drug investigations. I have participated in investigations relating specifically to the possession and distribution of cocaine and other drugs. I have also participated in various aspects of investigatory work to include numerous narcotics-related arrests and execution of many narcotics-related search warrants. I have written affidavits in support of search and arrest warrants. I have also interviewed defendants regarding various

criminal activities, to include narcotics trafficking. These interviews have included discussions of the use and meaning of code words in the sales and distribution of controlled substances.

2. I submit this affidavit to establish probable cause that on or about October 16, 2019, John KAYE of Essex Junction, Vermont possessed with intent to distribute more than 500 grams of cocaine HCL in violation of 21 U.S.C. § 841(a). The information contained within this affidavit is based upon my training, experience, and investigation, as well as information that has been conveyed to me by other law enforcement officers. The following is either known to me personally or has been related to me by persons having direct knowledge of the events described below, including other law enforcement officers involved in this investigation. Since this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation.

3. For the last few weeks DEA has been investigating Kaye for cocaine distribution. During this time DEA has conducted at least two undercover purchases of suspected cocaine HCL (field test positive) from Kaye in Essex Junction, Vermont. Earlier this week DEA became aware of telephone communications from Kaye indicating he would be travelling out of state to acquire new inventory of cocaine for distribution.

4. In the early morning hours of October 16, 2019, law enforcement pulled over the vehicle Kaye was driving as it travelled northbound in or near Shelburne, Vermont. No one else was in the vehicle. A search of the vehicle turned up approximately 1500 grams of cocaine HCL (field test positive), approximately \$15,000 in United States currency, and a notebook that appears to be a ledger reflecting Kaye's drug distribution activity. The DEA officer who conducted the undercover purchases referenced above previously identified Kaye by reference to a Department of Motor Vehicle photograph of Kaye. I have reviewed the same photograph, and met Kaye shortly after his arrest in Shelburne. Based on this review, Kaye is the same person who sold cocaine to the undercover DEA agent.

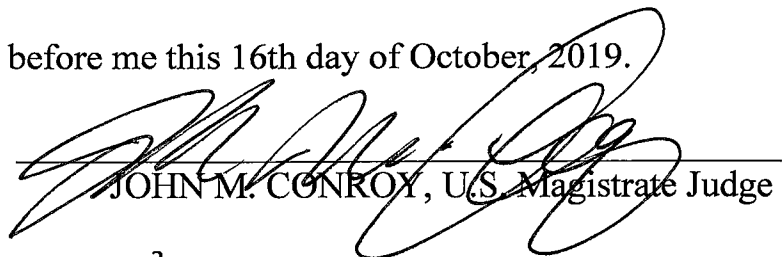
5. I know based on my training and experience the quantity of cocaine that Kaye was transporting is inconsistent with just personal use is indicative of the possessor's intent to distribute the drug.

Dated in Burlington, in the District of Vermont, this 16th day of October, 2019.



ADAM CHETWYND  
DEA Special Agent

Sworn and subscribed to before me this 16th day of October, 2019.



JOHN M. CONROY, U.S. Magistrate Judge